



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION IX**

**75 Hawthorne Street  
San Francisco, CA 94105-3901**

*Reading File*

October 23, 2008

Emmy Andrews  
Pacific Facilities Service Office  
United States Postal Service  
395 Oyster Point Boulevard, Suite 225  
South San Francisco, CA 94080-0300

Subject: Draft Environmental Impact Statement/Environmental Impact Report for the  
Proposed Construction and Operation of a Mail Processing Facility in Aliso  
Viejo, Orange County, California (CEQ # 20080282)

Dear Ms. Andrews:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508) and Section 309 of the Clean Air Act. EPA previously provided scoping comments for this project on March 6, 2008. Based on our review, we have rated the Draft Environmental Impact Statement (DEIS) for the proposed project as Environmental Concerns – Adequate Information (EC-1). Please see the enclosed "Summary of EPA Ratings." While we note that residents in the vicinity of the proposed facility may have significant concerns about impacts such as noise and changes in the visual environment, our comments below focus on those issues in which EPA has expertise and regulatory authority.

EPA notes that all mitigation measures included in the DEIS are described as measures that the United States Postal Service (USPS) *could* implement. We recommend that the Final Environmental Impact Statement (FEIS) and subsequent record of decision (ROD) include commitments to those measures. EPA is particularly concerned with ensuring that the FEIS includes commitments to the following mitigation measures:

**Recommended Mitigation Measures**

*Site Stability*

- Commit to implementing the recommendations of the geotechnical investigation report to mitigate the potential impacts of slope failure.

#### *Stormwater Management and Water Conservation*

- Commit to the best management practices (BMPs) and other mitigation measures listed in the DEIS to minimize impacts to water resources. In particular, EPA recommends that the USPS commit to constructing retention basins and other stormwater collection infrastructure to contain runoff from the site. As stated in our scoping comments, we recommend the use of “green infrastructure” such as bioretention areas, vegetated swales, porous pavement, and filter strips whenever possible. These features, in concert with other landscaping, could serve as both stormwater treatment and as a landscape buffer between the facility and the surrounding community.
- Commit to water conservation efforts, including use of native, drought-resistant plants in landscaping on the site, minimizing irrigation of landscaping, and utilizing recycled and reclaimed water for landscaping and other uses, as practical.

#### *Wildlife Protection*

- Commit to having a qualified biologist conduct a preconstruction survey for nesting birds within the property and within 100 feet of any proposed construction activity, and consulting with the U.S. Fish and Wildlife Service if nesting birds are found.

#### *Waste Prevention and Recycling*

- Commit to an active recycling and waste prevention program with aggressive goals for minimizing the amount of material sent to the landfill.

#### *Air Quality*

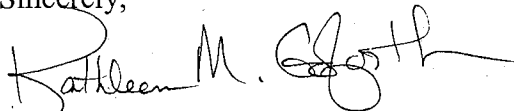
While the air quality analyses in the DEIS indicate that the project will not have significant impacts, EPA recommends the following additional mitigation measures to minimize potential impacts on air quality from construction and operation of the facility.

- Maximize use of newer vehicles, both in construction and operation of the facility, that can use improved, lower-emission diesel technology or alternative fuels, such as liquefied natural gas, fuel cells, or hybrid technologies. All diesel-powered alternatives should include installation of effective emission control systems on newer vehicles, and replacement of the oldest vehicles in the fleet with less polluting vehicles.
- Commit to minimizing unnecessary idling, both of construction equipment during the construction phase and of mail delivery trucks during loading and unloading operations at the site.
- Create a traffic management plan that will minimize queuing of trucks at the facility entrance.

In addition, we note that page 3-15 of the document states that the South Coast Air Basin is in nonattainment for carbon monoxide. The area is in attainment for that pollutant.

We appreciate the opportunity to review this DEIS. When the FEIS is released for public review, please send two copies to the address above (mail code: CED-2). If you have any questions, please contact Carolyn Mulvihill of my staff at 415-947-3554 or [mulvihill.carolyn@epa.gov](mailto:mulvihill.carolyn@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen M. Goforth". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Kathleen M. Goforth, Manager  
Environmental Review Office (CED-2)

Enclosure:  
Summary of EPA Rating Definitions

# SUMMARY OF EPA RATING DEFINITIONS

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

## ENVIRONMENTAL IMPACT OF THE ACTION

### *"LO" (Lack of Objections)*

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

### *"EC" (Environmental Concerns)*

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

### *"EO" (Environmental Objections)*

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

### *"EU" (Environmentally Unsatisfactory)*

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

## ADEQUACY OF THE IMPACT STATEMENT

### *Category 1" (Adequate)*

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

### *"Category 2" (Insufficient Information)*

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

### *"Category 3" (Inadequate)*

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."